

Anna M. Seidman  
D.C. Bar No. 417091  
(Pro Hac Vice)  
Safari Club International  
501 Second Street NE  
Washington, D.C. 20002  
Tel: 202-543-8733  
Fax: 202-543-1205  
[aseidman@safariclub.org](mailto:aseidman@safariclub.org)

*Attorney for Plaintiff Safari Club  
International*

Nathan Winger  
N. M. Bar No. 132612  
Pro Hac Vice  
Winger & Associates, P.C.  
121 Tijeras Avenue NE  
Suite 3500  
Albuquerque, New Mexico 87102  
Tel: 505-242-2824  
[nathan@wingerlawfirm.com](mailto:nathan@wingerlawfirm.com)

*Attorney for Plaintiffs Northern New  
Mexico Chapter of Safari Club  
International and Southern New Mexico  
Chapter of Safari Club International*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Safari Club International et al.,

Plaintiffs,

v.

Sally M.R. Jewell, et al.,

Defendants.

No. CV-16-00094-TUC-JGZ

**RESPONSE OF SAFARI CLUB  
INTERNATIONAL ET AL. TO  
MOTION TO INTERVENE OF  
CENTER FOR BIOLOGICAL  
DIVERSITY AND DEFENDERS OF  
WILDLIFE**

Safari Club International, the Northern New Mexico Chapter of Safari Club International and the Southern New Mexico Chapter of Safari Club International (“Safari Club”) take no position on the Motion to Intervene (Dkt. 44) filed by Center for Biological Diversity and Defenders of Wildlife (“CBD et al.”) other than to assert that:

- 1) Safari Club does not agree with CBD et al.’s factual description and legal arguments concerning the revisions to the Mexican Wolf experimental population rule. 80 Fed. Reg. 2512 (Jan. 16, 2015) (“10(j) Rule”); and
- 2) The Court should not permit CBD et al. to use the declarations of Peter Ossorio, Kim Crumbo and Jean Ossorio (Exhibits 3, 4, and 5 of CBD et al.’s Motion to Intervene), which make no mention of Safari Club’s lawsuit and address only CBD et al.’s own lawsuit and separate challenges to different aspects of the 10(j) Rule, as a means of introducing into this litigation the claims of CBD et al.’s lawsuit against Federal Defendants.

Dated this 9th day of May, 2016.

Respectfully submitted,

/s/ Anna M. Seidman  
Anna M. Seidman  
D.C. Bar No. 417091  
(Pro Hac Vice)  
Safari Club International  
501 Second Street NE  
Washington, D.C. 20002

Tel: 202-543-8733  
Fax: 202-543-1205  
[aseidman@safariclub.org](mailto:aseidman@safariclub.org)

/s/ Nathan Winger  
Nathan Winger  
N. M. Bar No. 132612  
(Pro Hac Vice)  
Winger & Associates, P.C.  
121 Tijeras Avenue NE  
Suite 3500  
Albuquerque, New Mexico 87102  
Tel: 505-242-2824  
[nathan@wingerlawfirm.com](mailto:nathan@wingerlawfirm.com)

*Attorneys for Plaintiffs Safari Club  
International, the Northern New Mexico  
Chapter of Safari Club International and  
the Southern New Mexico Chapter of  
Safari Club International*

**CERTIFICATE OF SERVICE**

I, hereby certify that on the 9<sup>th</sup> day of May, 2016, I caused the foregoing **RESPONSE OF SAFARI CLUB INTERNATIONAL ET AL. TO MOTION TO INTERVENE OF CENTER FOR BIOLOGICAL DIVERSITY AND DEFENDERS OF WILDLIFE** to be e-filed through the United States District Court CM/ECF electronic filing system and served on all counsel of record.

/s/Anna M. Seidman  
Anna M. Seidman